ADDENDUM

Baptist General Conference ("BGC") is an association of 1,068 Baptist churches located throughout the United States. Many of BGC's affiliated churches are new, and many others are growing. As BGC churches have sought zoning approval for new property acquisition or the expansion of existing church sites, they have received varying responses from local governments. BGC would welcome this Court's clarification of the rights of churches under the Free Exercise Clause of the First Amendment and RLUIPA.

Baptist Joint Committee for Religious Liberty ("BJC") serves fourteen cooperating Baptist conventions and conferences in the United States, with supporting congregations throughout the nation. BJC deals exclusively with religious liberty and church-state separation issues and believes that vigorous enforcement of both the Establishment and Free Exercise Clauses is essential to religious liberty for all Americans. As chair of the Coalition for the Free Exercise of Religion, BJC worked with dozens of religious and civil liberties organizations toward the passage of the Religious Land Use and Institutionalized Persons Act of 2000 and has defended its constitutionality and applicability in the courts.

The Church of Jesus Christ of Latter-day Saints is a Christian denomination with over thirteen million members worldwide. Due to rapid growth, the Church has an active program for constructing temples and chapels. In the course of its building program, the Church frequently encounters the types of land use problems at issue in this case. Although many local officials work with the Church in good faith to address legitimate land use concerns, the Church often confronts arbitrary or discriminatory land use decisions. In the Church's experience, a proper interpretation of RLUIPA's substantial burden test is essential to ensure that land use regulations are administered consistent with genuine respect for religious liberty. Moreover, the Church provided testimony to Congress during hearings which led to the

enactment of RLUIPA. It has an interest in courts interpreting RLUIPA in a manner that comports with congressional intent.

The Ethics & Religious Liberty Commission (ERLC) is the moral concerns and public policy entity of the Southern Baptist Convention (SBC), the nation's largest Protestant denomination, with over 42,000 churches and 16.3 million members. The ERLC is charged by the SBC with addressing public policies affecting the free exercise of religion, in addition to many other issues. In response to the command of Jesus Christ the Southern Baptist Convention is committed to growth through missions and evangelism. Its member congregations must build, renovate, and expand their physical properties to accommodate new worshippers and in response to the changing needs of changing cultures and communities as they seek to fulfill the Lord's command. Many Southern Baptist congregations face significant limitations to their ability to fulfill their understanding of God's mandate to them if repressive land and property use policies are imposed on them.

Evangelical Lutheran Church in America ("ELCA") is the largest Lutheran denomination in North America and the fifth largest Protestant church body in the United States. The ELCA has approximately 11,000 member congregations, which in turn have approximately 5.1 million individual members nationwide. Through the adoption of social statements by the ELCA Churchwide Assembly, the Church's highest legislative body, the ELCA adopts policy positions on issues of public importance. Through the Lutheran Office of Governmental Affairs in Washington, D.C., the ELCA engages in advocacy on public policy issues before the Congress of the United States of America. The ELCA supports an interpretation of RLUIPA that provides effective protection for religious land uses against arbitrary and discriminatory regulations.

The First Church of Christ, Scientist, in Boston Massachusetts, was founded by Mary Baker Eddy in 1879

with a healing mission that embraces humanity. It is designed to make the healing and educational system known as Christian Science available to everyone. Local Christian Science churches exist throughout the United States and in numerous other countries. The First Church of Christ, Scientist, has as part of its focus advancing and preserving religious rights for all.

General Conference of Seventh-day Adventists is the highest administrative level of the Seventh-day Adventist Church and represents nearly 59,000 congregations with more than 14 million members worldwide. In the United States, the North American Division of the General Conference oversees the work of more than 5,000 congregations with more than one million members. In addition to churches and related administrative offices, the denomination runs approximately 850 elementary schools, 114 secondary schools, 14 institutions of higher learning and 35 hospitals in the United States. These institutions are in all fifty states and thousands of local towns, municipalities and counties. The Seventh-day Adventist Church has a strong interest in seeking clarification of its rights under the Religious Land Use and Institutionalized Persons Act of 2000 and the United States Constitution.

General Council on Finance and Administration of the United Methodist Church ("GCFA") is a national agency of The United Methodist Church. The United Methodist Church is one of the largest religious denominations in the United States with more than eight million members, 43,000 clergy, and 35,000 local churches. It also has more than a million members outside the United States and performs mission work in over 165 countries. Under United Methodist Church polity, GCFA is the national agency charged with protecting the legal interests of the denomination. In that role, GCFA is called on to provide advice and assistance in situations where local governments are imposing discriminatory and unreasonable burdens on the construction of United

Methodist churches. GCFA has a strong interest in this case because it concerns the power of local governments to limit the right of United Methodists to practice their religion in the communities where they live.

International Church of the Foursquare Gospel ("ICFG"), a California nonprofit corporation, was established in 1927 to propagate and disseminate the principles of Christianity embraced in the Foursquare Gospel. As a hierarchical church, the ICFG operates Foursquare Gospel churches in the United States and around the world. As of the year 2006, there were there were 1,891 Foursquare churches in the 50 states of the United States with 260,644 members and 6,772 credentialed ministers. There are over 5 million adherents worldwide attending some 49,000 Foursquare churches. ICFG, in the operations of its many churches, is a landowner and builder of church related structures in many communities across the country. In many additional communities, ICFG is a tenant user of properties owned by others. In both capacities, ICFG has been subject to and complied with local land use laws, zoning laws, and building and safety codes with increasing difficulty. Unfortunately, our experience has been that such laws are not infrequently administered in a manner which, in our view, reflects a bias against religious organizations and their activities. Consequently, as a United States based church comprised largely of American citizen congregants, ICFG is increasingly concerned for the erosion of religious liberty we perceive. Our concern and our perceived duty as citizens prompt the interest and involvement of the International Church of the Foursquare Gospel in the matter before the Court.

The Lutheran Church–Missouri Synod ("The Synod") is a nonprofit corporation organized under the laws of the State of Missouri. It is the second largest Lutheran denomination in North America, with approximately 6,150 member congregations which, in turn, have approximately 2,500,000 baptized members. The Synod joins in this matter because it

shares the strong interest in safeguarding against arbitrary land use regulations and in preserving the protections provided under the Religious Land Use and Institutionalized Persons Act and the rights guaranteed under the First Amendment.

National Association of Evangelicals ("NAE") is the largest network of evangelical churches, denominations, colleges, and ministries in the United States. It serves 60 member denominations and associations, representing 45,000 local churches and over 30 million Christians. NAE serves as the collective voice of evangelical churches and ministries. NAE believes that religious freedom is a gift of God and vital to the limited government which is our American constitutional republic.

Clifton Kirkpatrick, as Stated Clerk of the General Assembly, is the senior continuing officer of the Presbyterian Church (U.S.A.). The Presbyterian Church (U.S.A.) is a national Christian denomination with nearly 2.3 million members in more than 11,200 congregations, organized into 173 presbyteries under the jurisdiction of 16 synods. Through its antecedent religious bodies, it has existed as an organized religious denomination within the current boundaries of the United States since 1706. In their efforts to construct houses of worship, its congregations have been subjected to arbitrary and discriminatory land use regulations. This brief is consistent with the policies adopted by the General Assembly regarding the religious liberty guarantees of the First Amendment. The General Assembly does not claim to speak for all Presbyterians, nor are its decisions binding on the membership of the Presbyterian Church. The General Assembly is the highest legislative and interpretive body of the denomination, and the final point of decision in all disputes. As such, its statements are considered worthy of respect and prayerful consideration of all the denomination's members.

United House of Prayer for All People of the Church on the Rock of the Apostolic Faith is a religious organization incorporated and headquartered in Washington, D.C. with active congregations in 26 states.

Worldwide Church of God (WCG) began in the early 1930's in Eugene, Oregon. In 1947, it was incorporated in California, where it maintains its worldwide headquarters. WCG has congregations throughout the United States and affiliate churches in many foreign countries. WCG owns property at its headquarters site and in other parts of the United States. WCG has encountered in the past, and anticipates encountering in the future, conflicts with governmental officials over building codes and regulations, zoning, and related issues. WCG has a poignant interest in the preservation of the Religious Land Use and Institutionalized Persons Act in order to have a vehicle by which it can adjudicate arbitrary and capricious governmental conduct regarding the use of its properties.